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Case Detail - Public

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Nubia Rincon Soto Plaintiff vs. Tacos Davie Co, et al Defendant

Broward County Case Number: CACE22005241
State Reporting Number: 062022CA005241AXXXCE
Court Type: Civil
Case Type: Other
Incident Date: N/A
Filing Date: 04/11/2022
Court Location: Central Courthouse
Case Status: Pending
Magistrate Id / Name: N/A
Judge ID / Name: 14 Rodriguez, Carlos Augusto

- Party(ies)

Total: 4

Party Type	Party Name	 Address	 Attorneys / Address ★ Denotes Lead Attorney
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Party Type	Party Name	? Address	? Attorneys / Address ★ Denotes Lead Attorney
Plaintiff	Rincon Soto, Nubia		★ Perera, Jorge Freddy Retained Bar ID: 93625 12555 Orange Dr. Second Floor Davie, FL 33330 Status: Active
Defendant	Tacos Davie Co		
Defendant	Cedeno, Juan F.		
Defendant	Torossi Palumbi, Jill T.		

- Disposition(s)







Total: 0

Date	Statistical Closure(s)		
Date	Disposition(s)	View	Page(s)

- Event(s) & Document(s)

Total: 10

Date	Description	Additional Text	View	Pages
05/11/2022	Summons Returned Served	10th day of May, 2022 Party: <i>Defendant</i> Cedeno, Juan F.		4
05/10/2022	Summons Returned Served	9th day of May, 2022 at 11:48 am Party: <i>Defendant</i> Torossi Palumbi, Jill T.		4

Date	Description	Additional Text	View	Pages
05/10/2022	Summons Returned Served	9th day of May, 2022 at 11:48 am Party: <i>Defendant</i> Tacos Davie Co		4
04/14/2022	eSummons Issuance	TACOS DAVIE, CO		3
04/14/2022	eSummons Issuance	JILL T. TOROSSO PALUMBI		3
04/14/2022	eSummons Issuance	JUAN F. CEDENO		3
04/13/2022	No Summons Issued			
04/11/2022	Per AOSC20-23 Amd12, Case is determined General			
04/11/2022	Civil Cover Sheet	Amount: \$30,001.00		3
04/11/2022	Complaint (eFiled)	Party: <i>Plaintiff</i> Rincon Soto, Nubia		16

— Hearing(s)

Total

There is no Disposition information available for this case.

— Related Case(s)

Total: 0

There is no related case information available for this case.

Brenda D. Forman

Clerk of Court

Broward County

17th Judicial Circuit



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Main Courthouse Location

201 SE 6th Street

Fort Lauderdale

Florida, US 33301

Phone: (954) 831-6565

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PURSUANT TO 119.12(2), F.S.

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PURSUANT TO RULE 2.420 ^

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Instead, contact this office by phone or in writing.

FORM 1.997. CIVIL COVER SHEET

The civil cover sheet and the information contained in it neither replace nor supplement the filing and service of pleadings or other documents as required by law. This form must be filed by the plaintiff or petitioner with the Clerk of Court for the purpose of reporting uniform data pursuant to section 25.075, Florida Statutes. (See instructions for completion.)

I. CASE STYLE

IN THE CIRCUIT/COUNTY COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT,
IN AND FOR BROWARD COUNTY, FLORIDA

Nubia Rincon Soto
Plaintiff

Case # _____
Judge _____

vs.

Tacos Davie, Co., Juan F. Cedenro, Jill T. Torossi Palumbi
Defendant

II. AMOUNT OF CLAIM

Please indicate the estimated amount of the claim, rounded to the nearest dollar. The estimated amount of the claim is requested for data collection and clerical processing purposes only. The amount of the claim shall not be used for any other purpose.

- ☐ \$8,000 or less
☐ \$8,001 - \$30,000
☒ \$30,001 - \$50,000
☐ \$50,001 - \$75,000
☐ \$75,001 - \$100,000
☐ over \$100,000.00

III. TYPE OF CASE (If the case fits more than one type of case, select the most definitive category.) If the most descriptive label is a subcategory (is indented under a broader category), place an x on both the main category and subcategory lines.

CIRCUIT CIVIL

- ☐ Condominium
- ☐ Contracts and indebtedness
- ☐ Eminent domain
- ☐ Auto negligence
- ☐ Negligence—other
 - ☐ Business governance
 - ☐ Business torts
 - ☐ Environmental/Toxic tort
 - ☐ Third party indemnification
 - ☐ Construction defect
 - ☐ Mass tort
 - ☐ Negligent security
 - ☐ Nursing home negligence
 - ☐ Premises liability—commercial
 - ☐ Premises liability—residential
- ☐ Products liability
- ☐ Real Property/Mortgage foreclosure
 - ☐ Commercial foreclosure
 - ☐ Homestead residential foreclosure
 - ☐ Non-homestead residential foreclosure
 - ☐ Other real property actions
- ☐ Professional malpractice
 - ☐ Malpractice—business
 - ☐ Malpractice—medical
 - ☐ Malpractice—other professional
- ☒ Other
 - ☐ Antitrust/Trade regulation
 - ☐ Business transactions
 - ☐ Constitutional challenge—statute or ordinance
 - ☐ Constitutional challenge—proposed amendment
 - ☐ Corporate trusts
 - ☐ Discrimination—employment or other
 - ☐ Insurance claims
 - ☐ Intellectual property
 - ☐ Libel/Slander
 - ☐ Shareholder derivative action
 - ☐ Securities litigation
 - ☐ Trade secrets
 - ☐ Trust litigation

COUNTY CIVIL

- ☐ Small Claims up to \$8,000
- ☐ Civil
- ☐ Real property/Mortgage foreclosure

- ☐ Replevins
- ☐ Evictions
 - ☐ Residential Evictions
 - ☐ Non-residential Evictions
- ☐ Other civil (non-monetary)

COMPLEX BUSINESS COURT

This action is appropriate for assignment to Complex Business Court as delineated and mandated by the Administrative Order. Yes ☐ No ☒

IV. REMEDIES SOUGHT (check all that apply):

- ☒ Monetary;
- ☒ Nonmonetary declaratory or injunctive relief;
- ☐ Punitive

V. NUMBER OF CAUSES OF ACTION: []
(Specify)

2

VI. IS THIS CASE A CLASS ACTION LAWSUIT?

- ☐ yes
- ☒ no

VII. HAS NOTICE OF ANY KNOWN RELATED CASE BEEN FILED?

- ☒ no
- ☐ yes If "yes," list all related cases by name, case number, and court.

VIII. IS JURY TRIAL DEMANDED IN COMPLAINT?

- ☒ yes
- ☐ no

IX. DOES THIS CASE INVOLVE ALLEGATIONS OF SEXUAL ABUSE?

- ☐ yes
- ☒ no

I CERTIFY that the information I have provided in this cover sheet is accurate to the best of my knowledge and belief, and that I have read and will comply with the requirements of Florida Rule of Judicial Administration 2.425.

Signature: s/ Jorge Freddy Perera
Attorney or party

Fla. Bar # 93625
(Bar # if attorney)

Jorge Freddy Perera
(type or print name)

04/11/2022
Date

**IN THE 17TH JUDICIAL CIRCUIT COURT
IN AND FOR BROWARD COUNTY, FLORIDA**

CASE NO.: _____

NUBIA RINCON SOTO,
and those similarly situated,

Plaintiff(s),

v.

TACOS DAVIE, CO.,
JUAN F. CEDENO, individually, and
JILL T. TOROSSİ PALUMBI, individually,

Defendants.

COMPLAINT

Plaintiff, **NUBIA RINCON SOTO** ("Plaintiff"), by and through undersigned counsel, on her behalf and on behalf of all others similarly situated, hereby files this Complaint and sues Defendants, **TACOS DAVIE, CO** ("Tacos Davie") and **JUAN F. CEDENO** ("Cedeno"), individually, and **JILL T. TOROSSİ PALUMBI** ("Palumbi"), individually, ("Tacos Davie", "Cedeno", and "Palumbi" are collectively referred to as "Defendants") and alleges as follows:

INTRODUCTION

1. This is an action by Plaintiff and all others similarly situated for unpaid overtime wages and minimum wages pursuant to the Fair Labor Standards Act, 29 U.S.C. §§ 201 *et seq.* ("FLSA").

2. Further, this is an action by Plaintiff and all others similarly against Defendants for unpaid minimum wages pursuant to the Florida Minimum Wage Act, Chapter 448 of the Florida Statutes ("FMWA").

3. Plaintiff and all others similarly situated seek damages within this Court's jurisdiction, reasonable attorneys' fees and costs pursuant to the FLSA and FMWA, and all other remedies allowable by law.

PARTIES, JURISDICTION AND VENUE

4. Plaintiff is an individual over the age of eighteen (18) and is otherwise *sui juris*.

5. Plaintiff was formerly employed by Defendants and performed work for Defendants in Broward County, Florida.

6. Defendant Tacos Davie a for-profit corporation operating out of Broward County, Florida, was at all material times authorized to conduct its for-profit business in Florida, as well as other states, and it is otherwise *sui juris*.

7. Defendant Cedenro was at all times material hereto an owner and operator of the corporate Defendant Tacos Davie for the relevant time period. Defendant Cedenro ran or otherwise oversaw the day-to-day operations of the corporate Defendant Tacos Davie, was involved in establishing the business of the corporate Defendant Tacos Davie, had supervisory authority over Plaintiff, was partially or totally responsible for paying Plaintiff's wages, and had the power to separate Plaintiff from her employment.

8. Defendant Palumbi was at all times material hereto an owner and operator of the corporate Defendant Tacos Davie for the relevant time period. Defendant Palumbi ran or otherwise oversaw the day-to-day operations of the corporate Defendant Tacos Davie, was involved in establishing the business of the corporate Defendant Tacos Davie, had supervisory authority over Plaintiff, was partially or totally responsible for paying Plaintiff's wages, and had the power to separate Plaintiff from her employment.

9. Defendants were Plaintiff's direct employers, joint employers, and co-employers as defined by the FLSA and FMWA.

10. Venue is proper in this Court because Defendants transact business in Broward County, Florida, Defendants maintain a principal place of business in Broward County, Florida, Defendants employed Plaintiff in Broward County, Florida, and the claims arose within Broward County, Florida.

11. All conditions precedent to this action have been satisfied by Plaintiff, waived by Defendants, or occurred.

GENERAL ALLEGATIONS

12. At all times material hereto, Defendants were, and continue to be, an "employer" within the meaning of 29 U.S.C. § 203 (d).

13. At all times material hereto, Plaintiff was an "employee" within the meaning of the Fair Labor Standards Act ("FLSA").

14. Upon information and belief, Defendant Taco Davie's annual gross income significantly exceeds the \$500,000.00 annual income threshold set for

enterprise coverage under the FLSA in 2021 and expected to exceed the \$500,000.00 threshold during 2022.

15. At all relevant times, Defendant Tacos Davie employed two or more employees that customarily, continually, and regularly handled goods and materials that i) were purchased from a person or entity outside the state of Florida and/or ii) were purchased in Florida but had previously traveled through interstate commerce.

16. Upon information and belief, Defendant Tacos Davie obtained and solicited funds from non-Florida sources, accepted funds from non-Florida sources, used telephonic transmissions going over state lines to do business, transmitted funds outside of the State of Florida and used electronic means to market and run their business internationally (i.e., sales).

17. Defendant Tacos Davie, at all material and relevant times, was engaged in interstate commerce and subject to enterprise coverage under the FLSA.

BACKGROUND

18. Plaintiff began working for Defendants on or about September 10, 2021 until on or about March 4, 2022.

19. During her employment with Defendants, Plaintiff was generally compensated at a rate of \$9.00 per hour.

20. During her employment with Defendants and despite Defendants' knowledge of her work hours, Plaintiff would work beyond forty (40) hours per week but would not receive full/proper overtime wages.

21. At the start of Plaintiff's employment, Defendant Cedeno informed Plaintiff that the company does not pay overtime. True to his word, Defendants failed to pay Plaintiff proper overtime wages.

22. When Plaintiff worked overtime hours, Defendants only paid Plaintiff at her straight rate of pay of \$9.00, thus failing to include the applicable halftime rate, accounting for all relevant compensation received by Plaintiff.

23. During her employment, Defendants' managers, including Cedeno, would regularly deduct from Plaintiff's earnings varying amounts of money for alleged register shortages, returns, and issues with food.

24. Defendants' practice of unilaterally deducting from Plaintiff's earnings resulted in Plaintiff receiving less than the federal minimum wage of \$7.25 per hour in violation of the FLSA.

25. Further, since September 30, 2021, when Florida increased its hourly minimum wage threshold to \$10.00, Defendants failed to tender Plaintiff at least an hourly rate of \$10.00 for each hour worked in violation of the Florida Minimum Wage Act.

COUNT I
UNPAID OVERTIME VIOLATION AGAINST
DEFENDANT TACOS DAVIE UNDER THE FLSA

26. Plaintiff re-alleges and incorporates by reference the allegations in paragraphs 1 through 25 as if fully set forth herein.

27. Upon information and belief, the annual volume of sales or business for Defendant exceeded \$500,000 during 2021 and is expected exceed \$500,000 at the conclusion of 2022

28. As part of its business, Defendant Tacos Davie sold goods and materials that traveled through interstate commerce during the relevant period.

29. During the relevant period, Defendant Tacos Davie obtained and solicited funds from non-Florida sources (*i.e.*, sales), accepted funds from non-Florida sources, used telephonic and electronic means to market and conduct business outside of the State of Florida, used telephonic and electronic transmissions going over state lines to do its business, transmitted funds outside the State of Florida, and otherwise regularly engaged in interstate commerce.

30. During the relevant period, Defendant Tacos Davie, upon information and belief, accepted credit card payments, wire transfers, and other forms of payments that were made or processed in connection with sales made inside and outside the state of Florida.

31. Defendant Tacos Davie engaged in interstate commerce and was subject to the FLSA during all relevant periods.

32. During Plaintiff's employment with Defendant Tacos Davie, Plaintiff worked over forty (40) hours per week on numerous occasions.

33. Despite customarily and regularly working overtime hours, and with knowledge of these overtime hours, Defendant Tacos Davie never compensated Plaintiff at the rate of time-and-a-half for all overtime hours worked.

34. Defendant Tacos Davie intentionally refused to pay Plaintiff overtime wages she is owed under the FLSA.

35. Defendant Tacos Davie is in violation of the FLSA and owes Plaintiff backpay.

36. In addition, Defendant Tacos Davie is liable for double the overtime amounts owed as liquidated damages under the FLSA as a result of its intentional and willful violations for up to the three-year statute of limitations afforded by the FLSA.

WHEREFORE, Plaintiff respectfully requests that the Court:

- a. Enter judgment against Defendant Tacos Davie under the FLSA;
- b. Award Plaintiff actual damages for the unpaid overtime wages;
- c. Award Plaintiff liquidated damages;
- d. Award Plaintiff attorneys' fees and costs;
- e. Award Plaintiff all recoverable interest; and
- f. Award any other relief this Honorable Court deems just and proper.

COUNT II
UNPAID OVERTIME VIOLATION AGAINST
DEFENDANT CEDENO UNDER THE FLSA

37. Plaintiff re-alleges and incorporates by reference the allegations in paragraphs 1 through 25 as if fully set forth herein.

38. Cedenno operated the day-to-day activities of Defendants' business, had supervisory authority over Plaintiff, had control/access to Plaintiff's records for work hours, and was partially or totally responsible for paying Plaintiff's wages.

39. Cedenno scrutinized Plaintiff's work and controlled how Plaintiff did her job.

40. During Plaintiff's employment with Defendants, Plaintiff worked for Defendants over 40 hours per week.

41. During her employment with Defendants, Plaintiff worked overtime hours for which she was not compensated at a rate of no less than one-and-one-half her regular rate of pay as required by the FLSA.

42. Plaintiff is owed unpaid overtime compensation pursuant to the FLSA.

43. Cedenno did not compensate Plaintiff for her overtime despite his knowledge of the overtime hours Plaintiff worked.

44. Cedenno is also jointly and severally liable for double the overtime amounts owed as liquidated damages under the FLSA as a result of his intentional and willful violation of the FLSA for up to the three-year statute of limitations afforded by the FLSA.

WHEREFORE, Plaintiff respectfully requests that the Court:

- a. Enter judgment for Plaintiff against Cedenno under the FLSA;
- b. Award Plaintiff actual damages for the unpaid wages;
- c. Award Plaintiff liquidated damages;

- d. Award Plaintiff his attorneys' fees and costs;
- e. Award Plaintiff all recoverable interest; and
- f. Award any other relief this Honorable Court deems just and proper.

COUNT III
UNPAID OVERTIME VIOLATION AGAINST
DEFENDANT PALUMBI UNDER THE FLSA

45. Plaintiff re-alleges and incorporates by reference the allegations in paragraphs 1 through 25 as if fully set forth herein.

46. Palumbi operated the day-to-day activities of Defendants' business, had supervisory authority over Plaintiff, had control/access to Plaintiff's records for work hours, and was partially or totally responsible for paying Plaintiff's wages.

47. Palumbi scrutinized Plaintiff's work and controlled how Plaintiff did her job.

48. During Plaintiff's employment with Defendants, Plaintiff worked for Defendants over 40 hours per week.

49. During her employment with Defendants, Plaintiff worked overtime hours for which she was not compensated at a rate of no less than one-and-one-half her regular rate of pay as required by the FLSA.

50. Plaintiff is owed unpaid overtime compensation pursuant to the FLSA.

51. Palumbi did not compensate Plaintiff for her overtime despite her knowledge of the overtime hours Plaintiff worked.

52. Palumbi is also jointly and severally liable for double the overtime amounts owed as liquidated damages under the FLSA as a result of her intentional and willful violation of the FLSA for up to the three-year statute of limitations afforded by the FLSA.

WHEREFORE, Plaintiff respectfully requests that the Court:

- a. Enter judgment for Plaintiff against Palumbi under the FLSA;
- b. Award Plaintiff actual damages for the unpaid wages;
- c. Award Plaintiff liquidated damages;
- d. Award Plaintiff his attorneys' fees and costs;
- e. Award Plaintiff all recoverable interest; and
- f. Award any other relief this Honorable Court deems just and proper.

COUNT IV
MINIMUM WAGE VIOLATION AGAINST
DEFENDANT TACOS DAVIE UNDER THE FLSA

47. Plaintiff re-alleges and incorporates by reference the allegations in paragraphs 1 through 25 as if fully set forth herein.

48. Defendant was Plaintiff's employer under the FLSA.

49. During the relevant time period, Plaintiff worked numerous hours that were not compensated at the federal statutory minimum wage rate given the illegal deductions and theft of Plaintiff's earnings.

50. As such, Plaintiff is owed back pay for hours worked.

51. Additionally, Defendant liable for double the amounts owed as liquidated damages under the FLSA as a result of the intentional and willful violation of the FLSA.

WHEREFORE, Plaintiff respectfully requests that the Court:

- a. Enter judgment against Defendant Tacos Davie under the FLSA;
- b. Award Plaintiff actual damages for the unpaid minimum wages;
- c. Award Plaintiff liquidated damages;
- d. Award Plaintiff attorneys' fees and costs;
- e. Award Plaintiff all recoverable interest; and
- f. Award any other relief this Honorable Court deems just and proper.

COUNT V
MINIMUM WAGE VIOLATION AGAINST
DEFENDANT CEDENO UNDER THE FLSA

52. Plaintiff re-alleges and incorporates by reference the allegations in paragraphs 1 through 25 as if fully set forth herein.

53. Defendant was Plaintiff's direct employer, joint employer, and/or co-employer under the FLSA.

54. During the relevant time period, Plaintiff worked numerous hours that were not compensated at the federal statutory minimum wage rate given the illegal deductions and theft of Plaintiff's earnings.

55. As such, Plaintiff is owed back pay for hours worked.

56. Additionally, Defendant liable for double the amounts owed as liquidated damages under the FLSA as a result of the intentional and willful violation of the FLSA.

WHEREFORE, Plaintiff respectfully requests that the Court:

- a. Enter judgment against Defendant Cedeno under the FLSA;

- b. Award Plaintiff actual damages for the unpaid minimum wages;
- c. Award Plaintiff liquidated damages;
- d. Award Plaintiff attorneys' fees and costs;
- e. Award Plaintiff all recoverable interest; and
- f. Award any other relief this Honorable Court deems just and proper.

COUNT VI
MINIMUM WAGE VIOLATION AGAINST
DEFENDANT PALUMBI UNDER THE FLSA

57. Plaintiff re-alleges and incorporates by reference the allegations in paragraphs 1 through 25 as if fully set forth herein.

58. Defendant was Plaintiff's direct employer, joint employer, and/or co-employer under the FLSA.

59. During the relevant time period, Plaintiff worked numerous hours that were not compensated at the federal statutory minimum wage rate given the illegal deductions and theft of Plaintiff's earnings.

60. As such, Plaintiff is owed back pay for hours worked.

61. Additionally, Defendant liable for double the amounts owed as liquidated damages under the FLSA as a result of the intentional and willful violation of the FLSA.

WHEREFORE, Plaintiff respectfully requests that the Court:

- a. Enter judgment against Defendant Palumbi under the FLSA;
- b. Award Plaintiff actual damages for the unpaid minimum wages;
- c. Award Plaintiff liquidated damages;

- d. Award Plaintiff attorneys' fees and costs;
- e. Award Plaintiff all recoverable interest; and
- f. Award any other relief this Honorable Court deems just and proper.

COUNT VII
VIOLATION OF THE FLORIDA MINIMUM WAGE ACT
BY DEFENDANT TACOS DAVIE, CO.

62. Plaintiff re-alleges and incorporate by reference the allegations in paragraphs 1 through 56 above as if fully set forth herein.

63. During her employment period, Plaintiff worked hours for Defendant Tacos Davie wherein Defendant failed to tender Plaintiff at least the prevailing statutory wage rate. As such, Plaintiff is owed back pay for hours worked.

64. In addition, Defendant Tacos Davie is liable for double the amounts owed as liquidated damages under the FMWA as a result of the intentional and willful violation of the FMWA.

WHEREFORE, Plaintiff respectfully requests that the Court:

- a. Enter judgment for Plaintiff against Defendant Tacos Davie under the FMWA;
- b. Award Plaintiff actual damages for unpaid minimum wages;
- c. Award Plaintiff liquidated damages;
- d. Award Plaintiff her attorneys' fees and costs;
- e. Award Plaintiff all recoverable interest; and
- f. Award any other relief this Honorable Court deems just and proper.

COUNT VIII
VIOLATION OF THE FLORIDA MINIMUM WAGE ACT
BY DEFENDANT JUAN F. CEDENO

65. Plaintiff re-alleges and incorporate by reference the allegations in paragraphs 1 through 25 above as if fully set forth herein.

66. Defendant Cedeno, in his ownership and supervisory capacity, jointly operated the corporate Defendant.

67. At all material times, Defendant Cedeno was a person with operational control over the corporate Defendants.

68. Defendant Cedeno jointly operated the day-to-day activities of the business, had supervisory authority over Plaintiff, had control/access to Plaintiff's records for work hours, and was partially or totally responsible for paying Plaintiff's wages.

69. During her employment, Plaintiff worked hours in which failed to receive Plaintiff at least the prevailing statutory wage rate. As such, Plaintiff is owed back pay for hours worked.

70. In addition, Defendant Cedeno is liable for double the amounts owed as liquidated damages under the FMWA as a result of the intentional and willful violation of the FMWA.

WHEREFORE, Plaintiff respectfully requests that the Court:

- a. Enter judgment for Plaintiff against Defendant Cedeno under the FMWA;
- b. Award Plaintiff actual damages for unpaid minimum wages;
- c. Award Plaintiff liquidated damages;

- d. Award Plaintiff her attorneys' fees and costs;
- e. Award Plaintiff all recoverable interest; and
- f. Award any other relief this Honorable Court deems just and proper.

COUNT IX
VIOLATION OF THE FLORIDA MINIMUM WAGE ACT
BY DEFENDANT JILL T. TOROSSİ PALUMBI

71. Plaintiffs re-allege and incorporate by reference the allegations in paragraphs 1 through 25 above as if fully set forth herein.

72. Defendant Palumbi, in her ownership and supervisory capacity, jointly operated the corporate Defendant.

73. At all material times, Defendant Palumbi was a person with operational control over the corporate Defendants.

74. Defendant Palumbi jointly operated the day-to-day activities of the business, had supervisory authority over Plaintiff, had control/access to Plaintiff's records for work hours, and was partially or totally responsible for paying Plaintiff's wages.

75. During her employment, Plaintiff worked hours in which failed to receive Plaintiff at least the prevailing statutory wage rate. As such, Plaintiff is owed back pay for hours worked.

76. In addition, Defendant Palumbi is liable for double the amounts owed as liquidated damages under the FMWA as a result of the intentional and willful violation of the FMWA.

WHEREFORE, Plaintiff respectfully requests that the Court:

- a. Enter judgment for Plaintiff against Defendant Palumbi under the FMWA;
- b. Award Plaintiff actual damages for unpaid minimum wages;
- c. Award Plaintiff liquidated damages;
- d. Award Plaintiff her attorneys' fees and costs;
- e. Award Plaintiff all recoverable interest; and
- f. Award any other relief this Honorable Court deems just and proper.

JURY TRIAL

Plaintiff hereby requests a trial by jury with respect to all claims so triable.

Dated: April 11, 2022.

Respectfully submitted,

By: **/s/ J. Freddy Perera**

J. Freddy Perera, Esq.

Florida Bar No. 93625

freddy@pba-law.com

Brody M. Shulman, Esq.

Florida Bar No. 92044

brody@pba-law.com

Alexander T. Harne, Esq.

Florida Bar No. 109482

harne@pba-law.com

PERERA ALEMÁN

12555 Orange Drive, Second Floor

Davie, Florida 33330

Telephone: 786-485-5232

Counsel for Plaintiff

**IN THE 17TH JUDICIAL CIRCUIT COURT
IN AND FOR BROWARD COUNTY, FLORIDA**

CASE NO.: CACE-22-005241

NUBIA RINCON SOTO,
and those similarly situated,

Plaintiff(s),

v.

TACOS DAVIE, CO.,
JUAN F. CEDENO, individually, and
JILL T. TOROSS PALUMBI, individually,

Defendants.

SUMMONS

THE STATE OF FLORIDA:
To Each Sheriff of Said State:

YOU ARE HEREBY COMMANDED to serve this Summons and a copy of the Complaint,
on Defendant:

JUAN F. CEDENO
13040 WEST STATE ROAD 84
DAVIE, FL 33325

Defendant is required to serve written defenses to the Complaint on Plaintiff's attorney,
whose name and address is: **J. Freddy Perera, Esq., Perera Alemán, 12555 Orange Drive,
Second Floor Davie, Florida 33330** within 20 calendar days after service of this summons on that
Defendant, exclusive of the day of service, and to file the original of the defenses with the Clerk
of the Court either before service on Plaintiff's attorney or immediately thereafter. If a Defendant
fails to do so, a default will be entered against that Defendant for the relief demanded in the
complaint or petition.

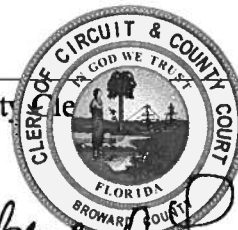
APR 18 2022

DATED ON _____, 2022.

BRENDA D. FORMAN

By: _____

As Deputy Clerk



Brenda D. Forman
BRENDA D. FORMAN

**SUMMONS:
PERSONAL SERVICE OF A NATURAL PERSON**

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served upon you to file a written response to the attached Complaint in this Court. A phone call will not protect you. Your written response, including the above case number and named parties, must be filed if you want the Court to hear your case. If you do not file your response on time, you may lose the case, and your wage, money and property may thereafter be taken without further warning from the Court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book).

If you choose to file a written response yourself, at the same time you file your written response to the Court you must also mail or take a carbon copy or photocopy of your written response to the "Plaintiffs/Plaintiffs' Attorney" named below.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene veinte (20) días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá; si usted desea que el escrito, incluyendo el número del caso y los nombres de las partes interesadas en dicho caso. Si usted no contesta la demanda a tiempo, pudiese perder el caso y podría ser despojado de sus ingresos y propiedades, o privada de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica.

Si desea responder a la demanda pro su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney." (Demandante o Abogado de Demandante).

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce Tribunal. Un simple coup de téléphone est insuffisant pour vous protéger; vous êtes obligé de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le Tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent être saisis par la suite, sans aucun préavis ultérieur du Tribunal. Il y a d'autres obligations juridiques et vous pouvez requérir les services immédiats d'un avocat. Si vous ne connaissez pas d'avocats, vous pourriez téléphoner à un service de référence d'avocats ou à un bureau d'assistance juridique (figurant à l'annuaire de téléphones).

Si vous choisissez de déposer vous-même une réponse écrite, il vous faudra également, en même temps que cette formalité, faire parvenir ou expédier une copie au carbone ou une photocopie de votre réponse écrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou à son avocate) nommé ci-dessous.

Filed By:

J. Freddy Perera, Esq.
Florida Bar No. 93625
freddy@pba-law.com
Brody M. Shulman, Esq.
Florida Bar No. 92044
brody@pba-law.com
Alexander T. Harne, Esq.
Florida Bar No. 109482
harne@pba-law.com

Address:

PERERA ALEMÁN
12555 Orange Drive, Second Floor
Davie, Florida 33330

**IN THE 17TH JUDICIAL CIRCUIT COURT
IN AND FOR BROWARD COUNTY, FLORIDA**

CASE NO.: CACE-22-005241

NUBIA RINCON SOTO,
and those similarly situated,

Plaintiff(s),

v.

TACOS DAVIE, CO.,
JUAN F. CEDENO, individually, and
JILL T. TOROSSİ PALUMBI, individually,

Defendants.

SUMMONS

THE STATE OF FLORIDA:
To Each Sheriff of Said State:

YOU ARE HEREBY COMMANDED to serve this Summons and a copy of the Complaint,
on Defendant:

JILL T. TOROSSİ PALUMBI
13040 WEST STATE ROAD 84
DAVIE, FL 33325

Defendant is required to serve written defenses to the Complaint on Plaintiff's attorney,
whose name and address is: **J. Freddy Perera, Esq., Perera Alemán, 12555 Orange Drive,
Second Floor Davie, Florida 33330** within 20 calendar days after service of this summons on that
Defendant, exclusive of the day of service, and to file the original of the defenses with the Clerk
of the Court either before service on Plaintiff's attorney or immediately thereafter. If a Defendant
fails to do so, a default will be entered against that Defendant for the relief demanded in the
complaint or p^a

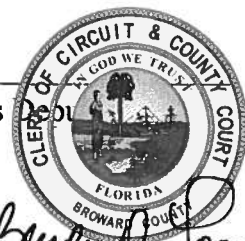
APR 18 2022

DATED ON _____, 2022.

BRENDA D. FORMAN

By: _____

As _____



Brenda D. Forman
BRENDA D. FORMAN

**IN THE 17TH JUDICIAL CIRCUIT COURT
IN AND FOR BROWARD COUNTY, FLORIDA
CASE NO.: CACE-22-005241**

NUBIA RINCON SOTO,
and those similarly situated,

Plaintiff(s),

v.

**TACOS DAVIE, CO.,
JUAN F. CEDENO, individually, and
JILL T. TOROSSİ PALUMBI, individually,**

Defendants.

SUMMONS

THE STATE OF FLORIDA:
To Each Sheriff of Said State:

YOU ARE HEREBY COMMANDED to serve this Summons and a copy of Complaint to Defendant:

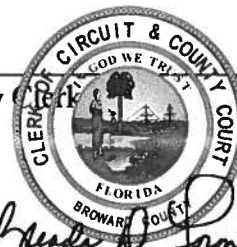
**TACOS DAVIE, CO.
THROUGH ITS REGISTERED AGENT:
JILL T. TOROSSİ PALUMBI
13040 WEST STATE ROAD 84
DAVIE, FL 33325**

Defendant is required to serve written defenses to the Complaint on Plaintiff's attorney, whose name and address is: **J. Freddy Perera, Esq., Perera Alemán, 12555 Orange Drive, Second Floor Davie, Florida 33330** within 20 calendar days after service of this summons on that Defendant, exclusive of the day of service, and to file the original of the defenses with the Clerk of the Court either before service on Plaintiff's attorney or immediately thereafter. If a Defendant fails to do so, a default will be entered against that Defendant for the relief demanded in the complaint or petition.

DATED C APR 18 2022 2022.

Brenda D. Forman

By: _____
As Deputy Clerk



RETURN OF SERVICE

State of Florida

County of Broward

Circuit Court

Case Number: CACE-22-005241



OJF2022008494

Plaintiff:

NUBIA RINCON SOTO

vs.

Defendant:

TACOS DAVIE, CO, ET AL

For:

J. FREDDY PERERA
PERERA ALEMAN PLLC
12401 ORANGE DR
STE 123
DAVIE, FL 33330

Received by OJF SERVICES, INC. on the 26th day of April, 2022 at 3:50 pm to be served on **TACOS DAVIE, CO. C/O REGISTERED AGENT: JILL T. TOROSS PALUMBI, 13040 WEST STATE RD. 84, DAVIE, FL 33325.**

I, SANDRA QUINONES, do hereby affirm that on the **9th day of May, 2022 at 11:48 am, I:**

CORPORATE - REGISTERED AGENT: served by delivering a true copy of the **SUMMONS AND COMPLAINT** with the date and hour of service endorsed thereon by me, to: **JILL TOROSS PALUMBI as Registered Agent** At the address of: **13040 WEST STATE RD. 84, DAVIE, FL 33325** for **TACOS DAVIE, CO. C/O REGISTERED AGENT: JILL T. TOROSS PALUMBI**, and informed said person of the contents therein, in compliance with either federal or state statutes.

I CERTIFY THAT I AM OVER THE AGE OF 18, HAVE NO INTEREST IN THE ABOVE ACTION, AND THAT I AM A SPECIAL PROCESS SERVER APPOINTED BY THE SHERIFF, IN GOOD STANDING, IN THE JUDICIAL CIRCUIT IN WHICH PROCESS WAS SERVED. "UNDER PENALTY OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING (DOCUMENT) AND THAT THE FACTS STATED IN IT ARE TRUE, 92.525. ELECTRONIC SIGNATURES ARE NOW PERMITTED PURSUANT TO FLORIDA STATUTE 48.21. NOTARY ARE NOT REQUIRED PURSUANT TO F.S. 92.525(2).

SANDRA QUINONES
SPS #394

OJF SERVICES, INC.
13727 S.W. 152nd Street
P.M.B. 354
Miami, FL 33177
(786) 293-5750

Our Job Serial Number: OJF-2022008494

Filing # 147743343 E-Filed 04/14/2022 05:00:25 PM

**IN THE 17TH JUDICIAL CIRCUIT COURT
IN AND FOR BROWARD COUNTY, FLORIDA
CASE NO.: CACE-22-005241**

NUBIA RINCON SOTO,
and those similarly situated,

Plaintiff(s),

v.

**TACOS DAVIE, CO.,
JUAN F. CEDENO, individually, and
JILL T. TOROSSİ PALUMBI, individually,**

Defendants.

SUMMONS

THE STATE OF FLORIDA:
To Each Sheriff of Said State:

YOU ARE HEREBY COMMANDED to serve this Summons and a copy of Complaint to Defendant:

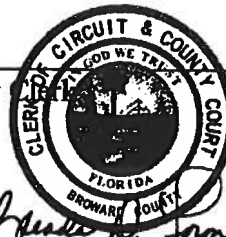
**TACOS DAVIE, CO.
THROUGH ITS REGISTERED AGENT:
JILL T. TOROSSİ PALUMBI
13040 WEST STATE ROAD 84
DAVIE, FL 33325**

Defendant is required to serve written defenses to the Complaint on Plaintiff's attorney, whose name and address is: **J. Freddy Perera, Esq., Perera Alemán, 12555 Orange Drive, Second Floor Davie, Florida 33330** within 20 calendar days after service of this summons on that Defendant, exclusive of the day of service, and to file the original of the defenses with the Clerk of the Court either before service on Plaintiff's attorney or immediately thereafter. If a Defendant fails to do so, a default will be entered against that Defendant for the relief demanded in the complaint or petition.

DATED C APR 18 2022 2022.

Brenda D. Forman

By: _____
As Deputy Clerk



**SUMMONS:
PERSONAL SERVICE OF A CORPORATION**

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served upon you to file a written response to the attached Complaint in this Court. A phone call will not protect you. Your written response, including the above case number and named parties, must be filed if you want the Court to hear your case. If you do not file your response on time, you may lose the case, and your wages, money and property may thereafter be taken without further warning from the Court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book).

If you choose to file a written response yourself, at the same time you file your written response to the Court you must also mail or take a carbon copy or photocopy of your written response to the "Plaintiff/Plaintiff Attorney" named below.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene veinte (20) dias, contados a partir del recibo de esta notificacion, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefonica no lo protegera; si usted desea que el escrito, incluyendo el numero del caso y los nombres de las partes interesadas en dicho caso. Si usted no contesta la demanda a tiempo, podria perder el caso y podria ser despojado de sus ingresos y propiedades, o priva de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guia telefonica.

Si desea responder a la demanda pro su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, debera usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney." (Demandante o Abogado de Demandante).

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce Tribunal. Un simple coup de téléphone est insuffisant pour vous protéger; vous êtes obligé de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le Tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent être saisis par la suite, sans aucun préavis ultérieur du Tribunal. Il y a d'autres obligations juridiques et vous pouvez requérir les services immédiats d'un avocat. Si vous ne connaissez pas d'avocats, vous pourriez téléphoner à un service de référence d'avocats ou à un bureau d'assistance juridique (figurant à l'annuaire de téléphones).

Si vous choisissez de déposer vous-même une réponse écrite, il vous faudra également, en même temps que cette formalité, faire parvenir ou expédier une copie au carbone ou une photocopie de votre réponse écrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou à son avocate) nommé ci-dessous.

Filed By:

J. Freddy Perera, Esq.

Florida Bar No. 93625

freddy@pba-law.com

Brody M. Shulman, Esq.

Florida Bar No. 92044

brody@pba-law.com

Alexander T. Harne, Esq.

Florida Bar No. 109482

harne@pba-law.com

Address:

PERERA ALEMÁN

12555 Orange Drive, Second Floor

Davie, Florida 33330

Telephone: 786-485-5232

RETURN OF SERVICE

State of Florida

County of Broward

Circuit Court

Case Number: CACE-22-005241

Plaintiff:
NUBIA RINCON SOTO

vs.

Defendant:
TACOS DAVIE, CO, ET AL

For:
J. FREDDY PERERA
PERERA ALEMAN PLLC
12401 ORANGE DR
STE 123
DAVIE, FL 33330



OJF2022008493

Received by OJF SERVICES, INC. on the 26th day of April, 2022 at 3:50 pm to be served on **JILL T. TOROSI PALUMBI, 13040 WEST STATE RD. 84, DAVIE, FL 33325.**

I, SANDRA QUINONES, do hereby affirm that on the **9th day of May, 2022 at 11:48 am, I:**

INDIVIDUAL/PERSONAL: served by delivering a true copy of the **SUMMONS AND COMPLAINT** to: **JILL T. TOROSI PALUMBI** at the address of: **13040 WEST STATE RD. 84, DAVIE, FL 33325** with the date and hour of service endorsed thereon by me, and informed said person of the contents therein, in compliance with state statutes.

Military Status: Based upon inquiry of party served, Defendant is not in the military service of the United States of America.

Marital Status: Based upon inquiry of party served, Defendant is not married.

I CERTIFY THAT I AM OVER THE AGE OF 18, HAVE NO INTEREST IN THE ABOVE ACTION, AND THAT I AM A SPECIAL PROCESS SERVER APPOINTED BY THE SHERIFF, IN GOOD STANDING, IN THE JUDICIAL CIRCUIT IN WHICH PROCESS WAS SERVED. "UNDER PENALTY OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING (DOCUMENT) AND THAT THE FACTS STATED IN IT ARE TRUE, 92.525. ELECTRONIC SIGNATURES ARE NOW PERMITTED PURSUANT TO FLORIDA STATUTE 48.21. NOTARY ARE NOT REQUIRED PURSUANT TO F.S. 92.525(2).

SANDRA QUINONES
SPS #394

OJF SERVICES, INC.
13727 S.W. 152nd Street
P.M.B. 354
Miami, FL 33177
(786) 293-5750

Our Job Serial Number: OJF-2022008493

RETURN OF SERVICE

State of Florida

County of Broward

Circuit Court

Case Number: CACE-22-005241

Plaintiff:

NUBIA RINCON SOTO

vs.

Defendant:

TACOS DAVIE, CO, ET AL

For:

J. FREDDY PERERA
PERERA ALEMAN PLLC
12401 ORANGE DR
STE 123
DAVIE, FL 33330



OJF2022008492

Received by OJF SERVICES, INC. on the 26th day of April, 2022 at 3:50 pm to be served on **JUAN F. CEDENO, 13040 WEST STATE RD. 84, DAVIE, FL 33325.**

I, SANDRA QUINONES, do hereby affirm that on the **10th day of May, 2022 at 3:42 pm, I:**

INDIVIDUAL/PERSONAL: served by delivering a true copy of the **SUMMONS AND COMPLAINT** to: **JUAN F. CEDENO** at the address of: **13040 WEST STATE RD. 84, DAVIE, FL 33325** with the date and hour of service endorsed thereon by me, and informed said person of the contents therein, in compliance with state statutes.

Military Status: Based upon inquiry of party served, Defendant is not in the military service of the United States of America.

Marital Status: Based upon inquiry of party served, Defendant is not married.

I CERTIFY THAT I AM OVER THE AGE OF 18, HAVE NO INTEREST IN THE ABOVE ACTION, AND THAT I AM A SPECIAL PROCESS SERVER APPOINTED BY THE SHERIFF, IN GOOD STANDING, IN THE JUDICIAL CIRCUIT IN WHICH PROCESS WAS SERVED. "UNDER PENALTY OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING (DOCUMENT) AND THAT THE FACTS STATED IN IT ARE TRUE, 92.525. ELECTRONIC SIGNATURES ARE NOW PERMITTED PURSUANT TO FLORIDA STATUTE 48.21. NOTARY ARE NOT REQUIRED PURSUANT TO F.S. 92.525(2).

SANDRA QUINONES
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OJF SERVICES, INC.
13727 S.W. 152nd Street
P.M.B. 354
Miami, FL 33177
(786) 293-5750

Our Job Serial Number: OJF-2022008492

Filing # 147743343 E-Filed 04/14/2022 05:00:25 PM

**IN THE 17TH JUDICIAL CIRCUIT COURT
IN AND FOR BROWARD COUNTY, FLORIDA**

CASE NO.: CACE-22-005241

NUBIA RINCON SOTO,
and those similarly situated,

Plaintiff(s),

v.

TACOS DAVIE, CO.,
JUAN F. CEDENO, individually, and
JILL T. TOROSS PALUMBI, individually,

Defendants.

SUMMONS

THE STATE OF FLORIDA:
To Each Sheriff of Said State:

YOU ARE HEREBY COMMANDED to serve this Summons and a copy of the Complaint,
on Defendant:

JUAN F. CEDENO
13040 WEST STATE ROAD 84
DAVIE, FL 33325

Defendant is required to serve written defenses to the Complaint on Plaintiff's attorney,
whose name and address is: **J. Freddy Perera, Esq., Perera Alemán, 12555 Orange Drive,
Second Floor Davie, Florida 33330** within 20 calendar days after service of this summons on that
Defendant, exclusive of the day of service, and to file the original of the defenses with the Clerk
of the Court either before service on Plaintiff's attorney or immediately thereafter. If a Defendant
fails to do so, a default will be entered against that Defendant for the relief demanded in the
complaint or petition.

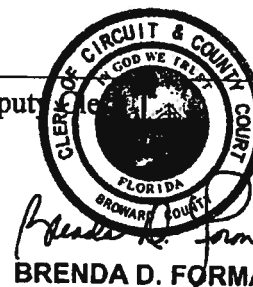
APR 18 2022

DATED ON _____, 2022.

BRENDA D. FORMAN

By: _____

As Deputy Clerk



**SUMMONS:
PERSONAL SERVICE OF A NATURAL PERSON**

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served upon you to file a written response to the attached Complaint in this Court. A phone call will not protect you. Your written response, including the above case number and named parties, must be filed if you want the Court to hear your case. If you do not file your response on time, you may lose the case, and your wage, money and property may thereafter be taken without further warning from the Court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book).

If you choose to file a written response yourself, at the same time you file your written response to the Court you must also mail or take a carbon copy or photocopy of your written response to the "Plaintiffs/Plaintiffs' Attorney" named below.

IMPORTANTE

Usted ha sido demandado legalmente. Tiene veinte (20) días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá; si usted desea que el escrito, incluyendo el número del caso y los nombres de las partes interesadas en dicho caso. Si usted no contesta la demanda a tiempo, podría perder el caso y podría ser despojado de sus ingresos y propiedades, o privada de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea puede usted consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica.

Si desea responder a la demanda pro su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney." (Demandante o Abogado de Demandante).

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce Tribunal. Un simple coup de téléphone est insuffisant pour vous protéger; vous êtes obligé de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le Tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent être saisis par la suite, sans aucun préavis ultérieur du Tribunal. Il y a d'autres obligations juridiques et vous pouvez requérir les services immédiats d'un avocat. Si vous ne connaissez pas d'avocats, vous pourriez téléphoner à un service de référence d'avocats ou à un bureau d'assistance juridique (figurant à l'annuaire de téléphones).

Si vous choisissez de déposer vous-même une réponse écrite, il vous faudra également, en même temps que cette formalité, faire parvenir ou expédier une copie au carbone ou une photocopie de votre réponse écrite au "Plaintiff/Plaintiff's Attorney" (Plaignant ou à son avocat) nommé ci-dessous.

Filed By:

J. Freddy Perera, Esq.
Florida Bar No. 93625
freddy@pba-law.com
Brody M. Shulman, Esq.
Florida Bar No. 92044
brody@pba-law.com
Alexander T. Harne, Esq.
Florida Bar No. 109482
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Address:

PERERA ALEMÁN
12555 Orange Drive, Second Floor
Davie, Florida 33330